

**DEPARTMENT OF FOOD AND AGRICULTURE**

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May 26, 1999

**MAY 28 1999**

Mr. Lester Snow, Director  
CALFED Bay-Delta Program  
1416 Ninth Street, Room 1155  
Sacramento, California 95814

Dear Mr. Snow:

Thank you for arranging the May 17<sup>th</sup> meeting with Secretary Nichols, yourself, Patrick Wright, and Marian Moe to discuss issues of mutual concern regarding the CALFED Bay-Delta Program. The purpose of this letter is to formally respond to some of the points in your April 9<sup>th</sup> memorandum and our May 17<sup>th</sup> meeting.

Fundamentally, the California Environmental Quality Act (CEQA) requires an analysis of alternate approach(es) to the common elements, including a rationale for the approach or approaches selected, full disclosure of impacts, and full disclosure of ways to avoid impacts and potential mitigation measures to reduce impacts. Clearly, compliance with CEQA will require equal treatment of all impacts whether they are impacts to agriculture or habitat.

While we can analyze the relative rates of agricultural land conversion between CALFED actions and urbanization, CEQA still requires full disclosure of impacts, avoidance, and mitigation to reduce impacts. Regardless of the relativity of conversion rate, CALFED actions that convert agricultural land are alone and cumulatively significant.

The potential impacts to irrigated agricultural land due to CALFED actions are at least as extensive as urbanization impacts statewide, and more extensive in the Delta region. For the sake of argument, let's assume that CALFED's actions will convert 275,000 acres agricultural land to other uses over the 30 year CALFED implementation period.

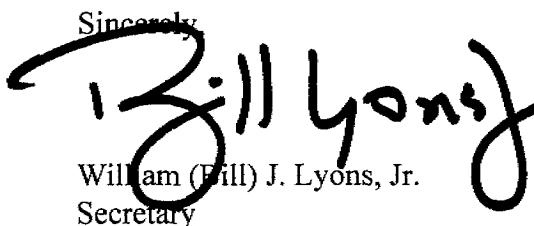
According to the California Department of Conservation, during 1992-1996, in the state, 33,080 acres of irrigated agricultural land was converted to urban uses; an annual rate of 8,270 acres per year. At that rate, over the next 30 years, 248,100 acres will be converted from irrigated agricultural land to urban uses. These figures suggest that CALFED's actions will result in conversion of irrigated agricultural land at a rate of 111% of the statewide conversion of irrigated agricultural land to urban uses. The impact of CALFED's action on irrigated land will be even greater in the Delta counties of Contra Costa, Sacramento, San Joaquin, Solano, and Yolo where estimated rates reach 162% of the rate of urbanization.

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I would like to stress that the Department's goal is to positively contribute to the completion of the CALFED Programmatic Environmental Impact Statement and Environmental Impact Report (PEIS/EIR). The Department believes that a successful PEIS/EIR must include programmatic policy and procedure to address impacts to agricultural resources by CALFED.

The Department has commented in good faith for several years on this topic and we look forward to productive collaboration to resolve this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Lyons, Jr.", with a large, stylized initial "B" and a long, sweeping underline.

William (Bill) J. Lyons, Jr.  
Secretary